

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FILED BY Cg D.C.
05 AUG -1 PM 2:22

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TENN. MEMPHIS

BETTY JONES,

Plaintiff

vs.

MEDEGEN MEDICAL PRODUCTS,
LLC,

Defendant

Civil Action No. 04-3052-M1/P

AGREED PROTECTIVE ORDER

Pursuant to the agreement of the parties, as evidenced by the signatures of counsel set forth below, the Court enters the following Order regarding Defendant's production of documents or information.

1. Counsel for Defendant may mark, stamp or otherwise designate documents or information to be produced as "Confidential". These designations are to be made in good faith. It is envisioned that the types of documents and information which would be designated as confidential are trade secrets, competitively valuable information, employee personnel, medical, workers compensation and accident information, and documents and information of a similarly sensitive or private nature.

2. Plaintiff and Plaintiff's counsel shall not disclose documents or information designated as confidential, and such documents or information shall not be used for any

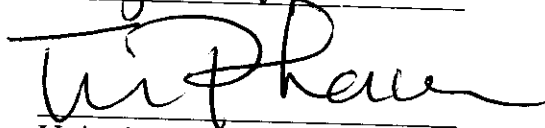
15

purpose other than in connection with the instant litigation.

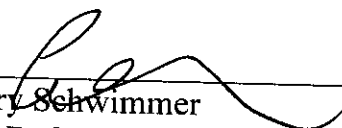
3. Any documents or information designated by Defendant as confidential must be treated as such until the party objecting to the designation obtains an order from the Court to the effect that such documents or information are not, in fact, confidential information.

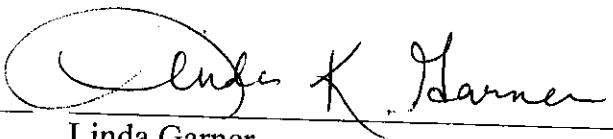
4. At the conclusion of this litigation, including any appeals, Plaintiff's counsel shall return to Defendant's counsel all documents or information designated by Defendant as confidential

IT IS SO ORDERED.

Date: August 1, 2005

United States District Judge
Magistrate

ACCEPTED AND AGREED:


Cary Schwimmer
for Defendant


Linda Garner
for Plaintiff



Notice of Distribution

This notice confirms a copy of the document docketed as number 15 in case 2:04-CV-03052 was distributed by fax, mail, or direct printing on August 1, 2005 to the parties listed.

Linda Kendall Garner
LAW OFFICE OF LINDA KENDALL GARNER
217 Exchange Ave.
Memphis, TN 38105

Cary Schwimmer
KIESEWETTER WISE KAPLAN SCHWIMMER & PRATHER
3725 Champion Hills Dr.
Ste. 3000
Memphis, TN 38125

Honorable Jon McCalla
US DISTRICT COURT